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BEFORE THE
Federal Communications Commission
WASHINGTON, D.C.

DEC 1 - 1997

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Revision of the Commission's) CC Docket No. 94-102
To Ensure Compatibility with) RM-8143
Enhanced 911 Emergency Calling)
Systems)

REPORT OF CTIA, PCIA, TDI, APCO, NENA, NASNA

The Cellular Telecommunications Industry Association ("CTIA"), Personal Communications Industry Association ("PCIA"), Telecommunications for the Deaf, Inc. ("TDI"), Association of Public-Safety Communications Officials-International, Inc. ("APCO"), National Emergency Number Association ("NENA"), and National Association of State Nine One One Administrators ("NASNA"),¹ respectfully submit this

¹ CTIA is the international organization of the wireless communications industry for both wireless carriers and manufacturers. Membership in the association covers Commercial Mobile Radio Service ("CMRS") providers and manufacturers. PCIA is an international trade association representing numerous segments of the wireless industry. PCIA's members include PCS licensees and those in the cellular, paging, ESMR, SMR, mobile data, cable, computer, manufacturing and local and interexchange sectors of the industry, as well as technicians, wireless systems integrators, communications site owners, distributors, service professional and private corporate system users. APCO International is a not-for-profit professional organization dedicated to the enhancement of public safety communications. APCO International represents the people who manage, operate, maintain, and supply the communications systems used to safeguard the lives and property of citizens worldwide. NENA is a non-profit organization which fosters the technological advancement, availability, and implementation of a universal emergency telephone number system. In carrying out its mission, NENA promotes research, planning, training and education. NASNA is an organization composed of state 9-1-1 directors and program administrators. Telecommunications for the Deaf, Inc.

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joint report on the status of certain issues regarding access to wireless E 9-1-1 via text telephone ("TTY") devices.²

In its Report and Order, the Commission requires the above mentioned parties to report jointly to the Commission on the status of "(1) whether incoming TTY 911 calls are properly identified in a timely manner by [public safety answering points ("PSAPs")], (i.e., whether TTY call identification equipment is in place in PSAP facilities), and (2) at the time a TTY 911 call is identified by the PSAP, whether ANI [automatic number information] and ALI [automatic location information] are initiated before the call is transferred to a TTY designated extension."³ This Report is intended to address the questions delineated by the Commission.

promotes full visual access to entertainment, information, and telecommunications for the nation's 28 million deaf and hard of hearing Americans through consumer education and involvement, technical assistance and consulting, application of existing and emerging technologies, networking and collaboration, uniformity of standards, and national policy development and advocacy.

² See In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Report and Order and Further Notice of Proposed Rulemaking, CC Docket No. 94-102, RM-8143, at ¶ 52 (released July 26, 1996) ("911 Report and Order").

³ 911 Report and Order at ¶ 52.

I. INCOMING WIRELESS TTY 911 CALLS ARE PROPERLY IDENTIFIED IN A TIMELY MANNER BY PSAPs

Currently, TTY devices that are compatible with analog wireless handsets are available in the marketplace. The industry, consumer groups, and Public Safety organizations continue to work on technical solutions for digital wireless handsets.⁴ Although the actual TTY devices used with wireless handsets may differ in form and function from those used with wireline equipment, the routing of TTY calls to PSAPs from a wireless phone is similar to the routing of wireline TTY calls. Therefore, the processes used by the PSAPs to handle TTY calls are identical for both wireless and wireline 911 calls.

APCO and NENA have implemented standard training programs that instruct PSAP administrators and operators about how to manage, identify and respond to TTY calls.⁵ Large numbers of PSAP managers and operators complete these training programs. PSAP operators are instructed to recognize a TTY call when they receive either a "silent call" or when they hear certain tones coming from a TTY device.⁶ They are then instructed to initiate a TTY

⁴ On November 20, 1997, CTIA, PCIA and consumer groups representing the hard of hearing community, signed a Consensus Agreement agreeing that the wireless industry will need an extra 15 months with a possible 3 month extension to develop solutions for processing TTY calls via digital equipment. See Attachment A.

⁵ See "APCO Basic Telecommunicator Course Handbook," Chapter 9.

⁶ The Commission associates the identification of incoming TTY calls with the availability of TTY "call identification

response and communicate with the calling party appropriately.

This set of procedures applies to both wireline and wireless 9-1-1 calls. PSAP operators do not treat wireless calls any differently from those calls coming from a landline telephone. The Public Safety organizations have found that the training program and procedures that they have developed allow PSAP operators to quickly and accurately identify TTY calls. The parties believe that these procedures allow PSAP operators to properly identify incoming TTY 911 calls -- either wireline or wireless -- in a timely manner.

II. ANI AND ALI ARE DELIVERED WITH TTY 911 CALLS IF PHASE I CAPABILITIES HAVE BEEN IMPLEMENTED AND DEPLOYED.

The Commission seeks information on whether ANI and ALI are initiated before a TTY 911 call is transferred to a TTY designated extension.⁷ As noted above, TTY 911 calls are routed in the same manner as regular 911 calls. Thus, the same ANI and ALI information associated with a regular wireless 911 call also will be associated with a TTY 911 call. As such, ANI and ALI will be delivered to the PSAP and also transferred to the TTY designated extension as long as the call is made from a valid subscriber, Phase I

equipment." Although some PSAPs do have equipment which identifies TTY calls by displaying a special indicator when the call is first received, only some PSAPs have such equipment. Thus, PSAP operators also are trained to identify such calls without special equipment.

⁷ 911 Report and Order at ¶ 52.

capabilities have been implemented by the carrier, the local exchange carrier can pass the necessary signaling information, and the PSAP has the ability to receive the data elements associated with Phase I capabilities.⁸

⁸ This capability is consistent with the TTY requirements delineated in the original Consensus Agreement, which were intended to provide TTY users with access to enhanced 911 features such as ALI and ANI. The parties note that these obligations were not intended to govern the broader TTY access requirements established by the Americans with Disabilities Act.

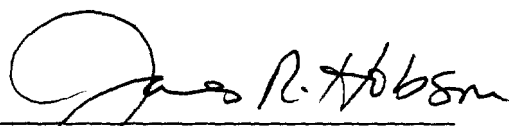
Respectfully Submitted,



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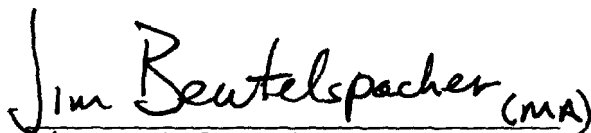
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